

**State:** District of Columbia **First Filing Company:** American Zurich Insurance Company, ...  
**TOI/Sub-TOI:** 01.0 Property/01.0001 Commercial Property (Fire and Allied Lines)  
**Product Name:** Commercial Property Terrorism Rate Revision  
**Project Name/Number:** Commercial Property Terrorism Rate Revision/43325

## Filing at a Glance

**Companies:** American Zurich Insurance Company  
 American Guarantee and Liability Insurance Company  
 Colonial American Casualty and Surety Company  
 Fidelity and Deposit Company of Maryland  
 Zurich American Insurance Company of Illinois  
 Zurich American Insurance Company  
 Empire Fire and Marine Insurance Company

**Product Name:** Commercial Property Terrorism Rate Revision  
**State:** District of Columbia  
**TOI:** 01.0 Property  
**Sub-TOI:** 01.0001 Commercial Property (Fire and Allied Lines)  
**Filing Type:** Rate/Rule  
**Date Submitted:** 02/07/2020  
**SERFF Tr Num:** ZURC-132253167  
**SERFF Status:** Submitted to State  
**State Tr Num:**  
**State Status:**  
**Co Tr Num:** 43325

**Effective Date** 07/01/2020  
**Requested (New):**  
**Effective Date** 07/01/2020  
**Requested (Renewal):**  
**Author(s):** Cindy Schultz  
**Reviewer(s):**  
**Disposition Date:**  
**Disposition Status:**  
**Effective Date (New):**  
**Effective Date (Renewal):**

**State:** District of Columbia **First Filing Company:** American Zurich Insurance Company, ...  
**TOI/Sub-TOI:** 01.0 Property/01.0001 Commercial Property (Fire and Allied Lines)  
**Product Name:** Commercial Property Terrorism Rate Revision  
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## General Information

Project Name: Commercial Property Terrorism Rate Revision Status of Filing in Domicile:  
 Project Number: 43325 Domicile Status Comments:  
 Reference Organization: Reference Number:  
 Reference Title: Advisory Org. Circular:  
 Filing Status Changed: 02/07/2020  
 State Status Changed: Deemer Date:  
 Created By: Cindy Schultz Submitted By: Cindy Schultz  
 Corresponding Filing Tracking Number:

### Filing Description:

We are filing a revised Terrorism rating plan. Please see Actuarial Memorandum and Exhibits for complete detail.

## Company and Contact

### Filing Contact Information

Cindy Schultz, Filing Analyst	cindy.schultz@zurichna.com
1299 Zurich Way	847-762-7311 [Phone]
Schaumburg, IL 60196	847-240-4514 [FAX]

**State:** District of Columbia **First Filing Company:** American Zurich Insurance Company, ...  
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**Filing Company Information**

American Zurich Insurance Company  
 1299 Zurich Way  
 Schaumburg, IL 60196  
 (847) 605-6000 ext. [Phone]

CoCode: 40142  
 Group Code: 212  
 Group Name:  
 FEIN Number: 36-3141762

State of Domicile: Illinois  
 Company Type:  
 State ID Number:

American Guarantee and Liability Insurance Company  
 1299 Zurich Way  
 Schaumburg, IL 60196  
 (847) 605-6000 ext. [Phone]

CoCode: 26247  
 Group Code: 212  
 Group Name:  
 FEIN Number: 36-6071400

State of Domicile: New York  
 Company Type:  
 State ID Number:

Colonial American Casualty and Surety Company  
 1299 Zurich Way  
 Schaumburg, IL 60196  
 (847) 605-6000 ext. [Phone]

CoCode: 34347  
 Group Code: 212  
 Group Name:  
 FEIN Number: 52-1096670

State of Domicile: Illinois  
 Company Type:  
 State ID Number:

Fidelity and Deposit Company of Maryland  
 1299 Zurich Way  
 Schaumburg, IL 60196  
 (847) 605-6000 ext. [Phone]

CoCode: 39306  
 Group Code: 212  
 Group Name:  
 FEIN Number: 13-3046577

State of Domicile: Illinois  
 Company Type:  
 State ID Number:

Zurich American Insurance Company of Illinois  
 1299 Zurich Way  
 Schaumburg, IL 60196  
 (847) 605-6000 ext. [Phone]

CoCode: 27855  
 Group Code: 212  
 Group Name:  
 FEIN Number: 36-2781080

State of Domicile: Illinois  
 Company Type:  
 State ID Number:

Zurich American Insurance Company  
 1299 Zurich Way  
 Schaumburg, IL 60196  
 (847) 605-6000 ext. [Phone]

CoCode: 16535  
 Group Code: 212  
 Group Name:  
 FEIN Number: 36-4233459

State of Domicile: New York  
 Company Type:  
 State ID Number:

Empire Fire and Marine Insurance Company  
 13810 FNB Parkway  
 Omaha, NE 68154-5202  
 (847) 605-6000 ext. [Phone]

CoCode: 21326  
 Group Code: 212  
 Group Name:  
 FEIN Number: 47-6022701

State of Domicile: Illinois  
 Company Type:  
 State ID Number:

**Filing Fees**

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**State:** District of Columbia **First Filing Company:** American Zurich Insurance Company, ...  
**TOI/Sub-TOI:** 01.0 Property/01.0001 Commercial Property (Fire and Allied Lines)  
**Product Name:** Commercial Property Terrorism Rate Revision  
**Project Name/Number:** Commercial Property Terrorism Rate Revision/43325

Fee Required? No

Retaliatory? No

Fee Explanation:

**State:** District of Columbia **First Filing Company:** American Zurich Insurance Company, ...  
**TOI/Sub-TOI:** 01.0 Property/01.0001 Commercial Property (Fire and Allied Lines)  
**Product Name:** Commercial Property Terrorism Rate Revision  
**Project Name/Number:** Commercial Property Terrorism Rate Revision/43325

## Rate Information

Rate data applies to filing.

**Filing Method:** File and Use  
**Rate Change Type:** Decrease  
**Overall Percentage of Last Rate Revision:** %  
**Effective Date of Last Rate Revision:**  
**Filing Method of Last Filing:** File and Use  
**SERFF Tracking Number of Last Filing:** PAPER

## Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
American Zurich Insurance Company	-7.700%	-7.700%	\$0	0	\$0	%	%
American Guarantee and Liability Insurance Company	-7.700%	-7.700%	\$-19,525	55	\$253,819	%	%
Colonial American Casualty and Surety Company	-7.700%	-7.700%	\$0	0	\$0	%	%
Fidelity and Deposit Company of Maryland	-7.700%	-7.700%	\$0	0	\$0	%	%
Zurich American Insurance Company of Illinois	-7.700%	-7.700%	\$0	0	\$0	%	%
Zurich American Insurance Company	-7.700%	-7.700%	\$-5,180	226	\$67,341	%	%
Empire Fire and Marine Insurance Company	-7.700%	-7.700%	\$0	0	\$0	%	%

SERFF Tracking #:

ZURC-132253167

State Tracking #:

Company Tracking #:

43325

State:

District of Columbia

First Filing Company:

American Zurich Insurance Company, ...

TOI/Sub-TOI:

01.0 Property/01.0001 Commercial Property (Fire and Allied Lines)

Product Name:

Commercial Property Terrorism Rate Revision

Project Name/Number:

Commercial Property Terrorism Rate Revision/43325

## Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		Acts of Terrorism	Additinoal Rule	Replacement	Paper Filing 2002	CW - Additional Rule.pdf

**ZURICH NORTH AMERICA**  
**COMMERCIAL LINES MANUAL**  
**DIVISION FIVE – COMMERCIAL PROPERTY**  
**COUNTRYWIDE**

EXCEPTION PAGE

Additional Rule

In accordance with the Terrorism Risk Insurance Program Reauthorization Act (TRIPRA), coverage for losses resulting from acts of terrorism will be made available on the same terms, amounts, and limitations as losses from other insured events. Rating for this exposure is first based on whether the policy is a package policy, with other lines of business included, or a monoline property-only policy.

Property exposures will be charged up to 2% against the total property coverage premium. This charge will also be applied to the monoline property coverages of Crime and Inland Marine.

However, those property exposures of high values and evaluated to have significant exposure to terrorism will be rated based on their propensity to suffer a loss from an act of terrorism. Risks will be evaluated based on their distance to potential targets such as large buildings or being located within a central business district of a metropolitan area. Also, specific occupancies will be considered in the rating process with rates modified according to the perceived attractiveness as a terrorist target.

Other factors that may affect the rating include:

1. Deductible
2. Coverage limits
3. Concentration of values

The premium will be calculated uniquely for each individual risk based upon the probability of each designated location to a terrorist-initiated event. Complete documentation, which will include the premium for the Named Insured and the specific characteristics of the risk supporting the individual risk pricing, will be maintained in the underwriting file for a period of at least five years after the inception date of the policy.

## Property Rate Development

### Step 1:

A based rate is determined based on city-specific geography. Cities were divided into 5 groups. The rates are as follows.

Tier 1 includes New York City and Washington DC. These cities were further subdivided into 5 zones to reflect the higher propensity for loss in Lower Manhattan, Midtown Manhattan, Downtown Washington DC, areas of Washington DC with concentration of political activity, and areas around downtown that are more populated and have higher propensity for a large value loss.

Base Rate					
Tier	1	2	3	4	5
Rate per \$100 TIV	0.00542	0.00335	0.00186	0.00162	0.0012

Base Rate					
Tier	1a	1b	1c	1d	1e
Rate per \$100 TIV	0.00374	0.0056	0.00748	0.00932	0.01171

### Step 2:

A modifier is applied based on a risk's distance in feet to one of three groups of identified terrorist targets.

Proximity Adjustment		
Target Type	Distance in feet	Modifier
High Risk	0 - 500	5.00
Medium Risk	0 - 800	2.50
Low Risk	0 - 500	1.50

**Step 3:**

An Occupancy modifier of 1.50 may be applied to the higher hazard occupancies of hotels, airports, stadiums, chemical and power generation with total insurable values greater than or equal to \$100 million. This modifier will only be applied if a Proximity modifier does not already apply.

**Step 4:**

The final step in the development of the rate includes adjustments for deductible, commissions and coverage limits.

Appendix

1. Tier Definitions

Tier Definitions					
Tier	1	2	3	4	5
Major Cities	New York City, Washington DC	Chicago, Los Angeles, San Francisco	Boston, Houston, Las Vegas, Miami, Philadelphia	Atlanta, Cleveland, Detroit, Orlando, Seattle	All Other

2. Proximity Adjustment Target Types – High, Medium and Low

High Risk

- Sears Tower (Willis Tower)
- Hartsfield Atlanta International Airport
- Chicago City Hall
- Art Institute of Chicago
- Chicago O'Hare International Airport
- L.A. Memorial Coliseum
- Pacific Stock Exchange (PSE) - Los Angeles
- Fenway Park
- Empire State Building
- Madison Square Garden
- Times Square
- George Bush Intercontinental Airport
- Houston Astrodome
- Federal Reserve Bank of San Francisco
- US Mint

Supreme Court of US  
White House  
Pentagon  
US Capitol

### Medium Risk

Defined as the Central Business Districts within a city, typically with a high concentration of office and retail buildings.

### Low Risk

Low risk classes include:

Airport  
Amusement Park  
Central Business District  
Commercial Landmark  
Decadent Target  
Foreign Consulate  
Gas Station  
Government Building  
Hotel/Casino  
House of Worship  
HQ of Global Fortune 100 Company  
HQ of Media Company  
Industrial Facility  
International Organization Headquarters  
Military Base  
Natural Gas Facility  
Nuclear Power Plant  
Oil Refinery  
Port  
Power Plant (Non-Nuclear)  
Principal Tourist Attraction  
Road Bridge/Tunnel  
Shopping Center/Mall  
Skyscraper  
Stadium  
Stock Exchange Building  
Subway/Train Station

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## Supporting Document Schedules

<b>Bypassed - Item:</b>	Consulting Authorization
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Actuarial Certification (P&C)
<b>Comments:</b>	
<b>Attachment(s):</b>	CW - Memo and Filing Exhibits.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	District of Columbia and Countrywide Experience for the Last 5 Years (P&C)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	District of Columbia and Countrywide Loss Ratio Analysis (P&C)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Red-Line Rate/Rule
<b>Comments:</b>	
<b>Attachment(s):</b>	CW - Additional Rule - Marked-up.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

**Zurich North America  
Commercial Property  
Countrywide**

**Actuarial Memorandum**

In accordance with the Terrorism Risk Insurance Program Reauthorization Act (TRIPRA), coverage for losses resulting from acts of terrorism will be made available on the same terms, amounts, and limitations as losses from other insured events. Rating for this exposure is first based on whether the policy is a package policy, with other lines of business included, or a monoline property-only policy.

Property exposures will be charged up to 2% against the total property coverage premium. This charge will also be applied to the monoline property coverages of Crime and Inland Marine.

However, those property exposures of high values and evaluated to have significant exposure to terrorism will be rated based on their propensity to suffer a loss from an act of terrorism. Risks will be evaluated based on their distance to potential targets such as large buildings or being located within a central business district of a metropolitan area. Also, specific occupancies will be considered in the rating process with rates modified according to the perceived attractiveness as a terrorist target.

Other factors that may affect the rating include:

1. Deductible
2. Coverage limits
3. Concentration of values

The premium will be calculated uniquely for each individual risk based upon the probability of each designated location to a terrorist-initiated event. Complete documentation, which will include the premium for the Named Insured and the specific characteristics of the risk supporting the individual risk pricing, will be maintained in the underwriting file for a period of at least five years after the inception date of the policy.

The following supporting exhibits are provided:

- Exhibit 1: Program Information
- Exhibit 2: Rating Example - Terrorism

**Zurich North America  
Commercial Property  
Countrywide**

**Program Information**

Property Rate Development:

Step 1:

A base rate is determined based on city-specific geography. Cities were divided into 5 groups. The rates are as follows.

Tier 1 includes New York City and Washington DC. These cities were further subdivided into 5 zones to reflect the higher propensity for loss in Lower Manhattan, Midtown Manhattan, Downtown Washington DC, areas of Washington DC with concentration of political activity, and areas around downtown that are more populated and have higher propensity for a large value loss.

Base Rate					
Tier	1	2	3	4	5
Rate per \$100 TIV	0.00542	0.00335	0.00186	0.00162	0.0012

Base Rate					
Tier	1a	1b	1c	1d	1e
Rate per \$100 TIV	0.00374	0.0056	0.00748	0.00932	0.01171

Step 2:

A modifier is applied based on a risk's distance in feet to one of three groups of identified terrorist targets.

Proximity Adjustment		
Target Type	Distance in feet	Modifier
High Risk	0 - 500	5.0
Medium Risk	0 - 800	2.5
Low Risk	0 - 500	1.5

**Zurich North America  
Commercial Property  
Countrywide**

**Program Information**

Step 3:

An Occupancy modifier of 1.50 may be applied to the higher hazard occupancies of hotels, airports, stadiums, chemical and power generation with total insurable values greater than or equal to \$100 million. This modifier will only be applied if a Proximity modifier does not already apply.

Step 4:

The final step in the development of the rate includes adjustments for deductible, commissions and coverage limits.

Appendix

1. Tier Definitions

Tier Definitions					
Tier	1	2	3	4	5
Major Cities	New York City, Washington DC	Chicago, Los Angeles, San Francisco	Boston, Houston, Las Vegas, Miami, Philadelphia	Atlanta, Cleveland, Detroit, Orlando, Seattle	All Other

**Zurich North America  
Commercial Property  
Countrywide**

**Program Information**

2. Proximity Adjustment Target Types - High, Medium and Low

High Risk:

Sears Tower (Willis Tower)  
Hartsfield Atlanta International Airport  
Chicago City Hall  
Art Institute of Chicago  
Chicago O'Hare International Airport  
L.A. Memorial Coliseum  
Pacific Stock Exchange (PSE) - Los Angeles  
Fenway Park  
Empire State Building  
Madison Square Garden  
Times Square  
George Bush Intercontinental Airport  
Houston Astrodome  
Federal Reserve Bank of San Francisco  
US Mint  
Supreme Court of US  
White House  
Pentagon  
US Capitol

Medium Risk:

Defined as the Central Business Districts within a city, typically with a high concentration of office and retail buildings.

**Zurich North America  
Commercial Property  
Countrywide**

**Program Information**

Low Risk:

Airport  
Amusement Park  
Central Business District  
Commercial Landmark  
Decadent Target  
Foreign Consulate  
Gas Station  
Government Building  
Hotel/Casino  
House of Worship  
HQ of Global Fortune 100 Company  
HQ of Media Company  
Industrial Facility  
International Organization Headquarters  
Military Base  
Natural Gas Facility  
Nuclear Power Plant  
Oil Refinery  
Port  
Power Plant (Non-Nuclear)  
Principal Tourist Attraction  
Road Bridge/Tunnel  
Shopping Center/Mall  
Skyscraper  
Stadium  
Stock Exchange Building  
Subway/Train Station

**Zurich North America  
Commercial Property  
Countrywide**

**Rating Example - Terrorism**

Account:		<b>Customer A</b>			<b>Deductible</b>	
Commission:		<b>15%</b>			Combined PD/BI	25,000
					Split PD/BI	0
					BI days	0
					BI calculated	0
<b>Layer</b>	<b>attachment (\$K)</b>	<b>layer limit (\$K)</b>	<b>layer top (\$K)</b>	<b>Zurich-part</b>	<b>Zurich-lim</b>	<b>Total Premium</b>
<i>primary</i>	0	315,000	315,000	100%	315,000,000	8,659

City	SIC	PD Total	Annualized BI	TIV	Tier	Base Rate	Proximity to High-Profile	Proximity to Hot Zone (ft)	Proximity to Other Target	Proximity modifier	Capacity Modifier	Occupancy Hazard	Occupancy Modifier	Location Premium
Carver	5399	9,550,872	539,358	10,090,230	5	0.00120	999,999	300	999,999	2.50	1.00	M	1.00	302
Atlanta	5399	6,886,826	780,857	7,667,683	4	0.00162	100	999,999	41,478	5.00	1.00	M	1.00	623
Boston	5399	6,621,938	604,531	7,226,469	3	0.00186	999,999	999,999	999,999	1.00	1.00	M	1.00	135
Chicago	5399	1,910,174	350,976	2,261,150	2	0.00335	999,999	999,999	999,999	1.00	1.01	M	1.00	77
New York City	5399	1,938,000	570,700	2,508,700	1a	0.00374	1,000	15,000	20,000	1.00	1.01	M	1.00	95
New York City	5399	5,045,328	618,946	5,664,274	1b	0.00560	10	1,000	50,000	5.00	1.25	M	1.00	1,984
Washington	5399	869,677	300,000	1,169,677	1c	0.00748	1,000	10	50,000	2.50	1.01	M	1.00	221
Washington	5399	6,911,948	473,108	7,385,056	1d	0.00932	99,999	20,000	4,000	1.00	1.00	M	1.00	688
New York City	5399	5,420,000	631,761	6,051,761	1e	0.01171	10	1,000	50,000	5.00	1.28	M	1.00	4,534

**ZURICH NORTH AMERICA**  
**COMMERCIAL LINES MANUAL**  
**DIVISION FIVE – COMMERCIAL PROPERTY**  
**TERRORISM RISK INSURANCE ACT 2002 (TRIA)**  
**“Certified”**  
**COUNTRYWIDE**  
**EXCEPTION PAGE**

11/26/02 Document Edition  
10/2019 Edition

**ACT OF TERRORISM**

**Additional Rule**

~~In accordance with the Terrorism Risk Insurance Act of 2002 (TRIA2002), coverage for losses resulting from acts of terrorism will be made available on the same terms, amounts and limitations as losses from other events. Rating for this exposure is first based on whether the policy is a package policy, with other lines of business included, or a monoline property only policy.~~

In accordance with the Terrorism Risk Insurance Program Reauthorization Act (TRIPRA), coverage for losses resulting from acts of terrorism will be made available on the same terms, amounts, and limitations as losses from other insured events. Rating for this exposure is first based on whether the policy is a package policy, with other lines of business included, or a monoline property-only policy.

~~Property exposures written on a package policy will be charged 2 % against the final property coverage premium for the property lines. This 2% charge will also be applied to monoline property coverages of crime and inland marine exposures.~~

Property exposures will be charged up to 2% against the total property coverage premium. This charge will also be applied to the monoline property coverages of Crime and Inland Marine.

~~However, those property exposures not written on a package policy or of high values and presenting significant public exposure such as shopping malls, high rise hotels, and casinos will be rated based on an evaluation of their propensity to suffer a loss from an act of terrorism. Rating methodology has been developed to assist the underwriter in determining the probability that a location could suffer a loss from an act of terrorism. This is based upon the concentration of values, occupancy characteristics, and the proximity to other terrorist-attractive risks.~~

However, those property exposures of high values and evaluated to have significant exposure to terrorism will be rated based on their propensity to suffer a loss from an act of terrorism. Risks will be evaluated based on their distance to potential targets such as large buildings or being located within a central business district of a metropolitan area. Also, specific occupancies will be considered in the rating process with rates modified according to the perceived attractiveness as a terrorist target.

Other factors that could affect the rating include:

1. Deductibles (which can vary by coverage and by location)
2. Annual Aggregate level

Other factors that may affect the rating include:

1. Deductible
2. Coverage limits
3. Concentration of values

The premium will be calculated uniquely for each individual risk based upon the probability of each designated location to a ~~terrorist initiated~~ terrorist-initiated event. Complete documentation, which will include the premium for the Named Insured and the specific characteristics of the risk supporting the individual risk pricing, will be maintained in the underwriting file for a period of at least five years after the effective inception date of the policy.

## Property Rate Development

### Step 1:

A based rate is determined based on city-specific geography. Cities were divided into 5 groups. The rates are as follows.

Tier 1 includes New York City and Washington DC. These cities were further subdivided into 5 zones to reflect the higher propensity for loss in Lower Manhattan, Midtown Manhattan, Downtown Washington DC, areas of Washington DC with concentration of political activity, and areas around downtown that are more populated and have higher propensity for a large value loss.

<u>Base Rate</u>					
<u>Tier</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
<u>Rate per \$100 TIV</u>	<u>0.00542</u>	<u>0.00335</u>	<u>0.00186</u>	<u>0.00162</u>	<u>0.0012</u>

<u>Base Rate</u>					
<u>Tier</u>	<u>1a</u>	<u>1b</u>	<u>1c</u>	<u>1d</u>	<u>1e</u>
<u>Rate per \$100 TIV</u>	<u>0.00374</u>	<u>0.0056</u>	<u>0.00748</u>	<u>0.00932</u>	<u>0.01171</u>

### Step 2:

A modifier is applied based on a risk's distance in feet to one of three groups of identified terrorist targets.

<u>Proximity Adjustment</u>		
<u>Target Type</u>	<u>Distance in feet</u>	<u>Modifier</u>
<u>High Risk</u>	<u>0 - 500</u>	<u>5.00</u>
<u>Medium Risk</u>	<u>0 - 800</u>	<u>2.50</u>
<u>Low Risk</u>	<u>0 - 500</u>	<u>1.50</u>

**Step 3:**

An Occupancy modifier of 1.50 may be applied to the higher hazard occupancies of hotels, airports, stadiums, chemical and power generation with total insurable values greater than or equal to \$100 million. This modifier will only be applied if a Proximity modifier does not already apply.

**Step 4:**

The final step in the development of the rate includes adjustments for deductible, commissions and coverage limits.

Appendix

1. Tier Definitions

<b>Tier Definitions</b>					
<b><u>Tier</u></b>	<b><u>1</u></b>	<b><u>2</u></b>	<b><u>3</u></b>	<b><u>4</u></b>	<b><u>5</u></b>
<b><u>Major Cities</u></b>	<u>New York City, Washington DC</u>	<u>Chicago, Los Angeles, San Francisco</u>	<u>Boston, Houston, Las Vegas, Miami, Philadelphia</u>	<u>Atlanta, Cleveland, Detroit, Orlando, Seattle</u>	<u>All Other</u>

2. Proximity Adjustment Target Types – High, Medium and Low

High Risk

- Sears Tower (Willis Tower)
- Hartsfield Atlanta International Airport
- Chicago City Hall
- Art Institute of Chicago
- Chicago O'Hare International Airport
- L.A. Memorial Coliseum
- Pacific Stock Exchange (PSE) - Los Angeles
- Fenway Park
- Empire State Building
- Madison Square Garden
- Times Square
- George Bush Intercontinental Airport
- Houston Astrodome
- Federal Reserve Bank of San Francisco
- US Mint

Supreme Court of US

White House

Pentagon

US Capitol

### Medium Risk

Defined as the Central Business Districts within a city, typically with a high concentration of office and retail buildings.

### Low Risk

Low risk classes include:

Airport

Amusement Park

Central Business District

Commercial Landmark

Decadent Target

Foreign Consulate

Gas Station

Government Building

Hotel/Casino

House of Worship

HQ of Global Fortune 100 Company

HQ of Media Company

Industrial Facility

International Organization Headquarters

Military Base

Natural Gas Facility

Nuclear Power Plant

Oil Refinery

Port

Power Plant (Non-Nuclear)

Principal Tourist Attraction

Road Bridge/Tunnel

Shopping Center/Mall

Skyscraper

Stadium

Stock Exchange Building

Subway/Train Station